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August 11, 2023

SO ORDERED.

VIA ECF

Hon. Alvin K. Hellerstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

/s/ Alvin Hellerstein  
August 22, 2023

**Re: *The Avon Company f/k/a New Avon LLC et al. v. Fareva Morton Grove, Inc. et al.*, Case No. 22-cv-4724**

Dear Judge Hellerstein:

We represent Plaintiffs The Avon Company f/k/a New Avon LLC and LG H&H Co., Ltd. f/k/a LG Household & Health Care, Ltd (collectively, "Avon") in the above-referenced matter.

We write to respectfully request that the Court enter an Order to maintain under seal: (i) the documents discussed below, which Avon is submitting as exhibits in support of its portion of the parties' joint letter, dated August 11, 2023, filed contemporaneously herewith (the "Joint Letter"), and (ii) portions of the Joint Letter that reference or quote such documents. Copies of these documents are being contemporaneously filed under seal pursuant to the Court's standing order, 19-mc-00583, and this Court's Individual Rule 4(B)(ii). In support of this Letter Motion, Avon states as follows:

On October 7, 2022, this Court entered a Stipulated Confidentiality Agreement and Protective Order (the "Protective Order"). (ECF No. 65.) The Protective Order permits either party to designate Discovery Material as "Confidential" or "Attorneys' Eyes Only," and provides that information so designated may not be disclosed except as expressly permitted under the Protective Order. (ECF No. 65 at ¶¶ 2, 12.)

In support of Avon's section of the parties' joint letter, Avon intends to submit the following documents as exhibits, which Fareva has designated as "Attorneys' Eyes Only" or "Confidential":

1. An email produced by Fareva in this action Bates stamped FMG\_00221616 – FMG\_0021618, which Fareva designated as "Confidential";
2. An email produced by Fareva in this action Bates stamped FMG\_00568476 – FMG\_00568480, which Fareva designated as "Confidential";

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3. An email produced by Fareva in this action Bates stamped FMG\_00259527 – FMG\_00259535, which Fareva designated as “Attorneys’ Eyes Only”;
4. An email produced by Fareva in this action Bates stamped FMG\_00199736 – FMG\_00199744, which Fareva designated as “Confidential”; and
5. An email produced by Fareva in this action Bates stamped FMG\_00172771 – FMG\_00172778, which Fareva designated as “Confidential.”

In addition to submitting the foregoing documents as exhibits, Avon intends to reference and quote such documents in its portion of the Joint Letter.

Accordingly, Avon respectfully requests that the Court maintain such documents under seal, subject to any contrary request by Fareva at any time. By making this sealing request, Avon is not contending that good cause exists to designate any of the foregoing materials as Confidential or Attorneys’ Eyes Only within the meaning of the Protective Order. Instead, Avon merely seeks to comply with its obligations under the Protective Order to file under seal documents that Fareva has designated or may designate as Confidential or Attorneys’ Eyes Only. With Fareva’s permission, Avon is prepared to re-file the foregoing documents or portions thereof publicly.

Thank you in advance for your consideration of this request.

Respectfully submitted,

/s/ Robert I. Steiner  
Robert I. Steiner

cc: All Counsel of Record (via ECF)